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14 DOLLAR TREE STORES, INC. and FRANK SCOTT

15  
16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18

19 RONALD M. MAROVICH,

20 Plaintiff,

21 vs.

22 DOLLAR TREE STORES, INC., a  
Corporation, FRANK SCOTT, an individual,  
23 and DOES I through X, inclusive

24 Defendants.

Case No.: C 06-02329 TEH

**STIPULATION AND ~~PROPOSED~~  
ORDER TO FURTHER EXTEND TIME  
FOR DEFENDANT FRANK SCOTT TO  
RESPOND TO COMPLAINT**

25 **STIPULATION**  
26

27 WHEREAS, Plaintiff Ronald M. Marovich ("Plaintiff") intends to file a Motion for  
28 Remand, and defendant Frank Scott ("Scott") intends to file a Motion to Dismiss; and

SF #1093548 v1

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STIPULATION AND [PROPOSED] ORDER TO FURTHER EXTEND TIME FOR FRANK SCOTT TO RESPOND TO  
COMPLAINT

1 WHEREAS, Plaintiff and Scott have stipulated and proposed to the Court that their  
2 respective motions be briefed and heard concurrently; and

3  
4 WHEREAS, based upon the current schedule of Plaintiff's counsel, Plaintiff does not  
5 have sufficient time to prepare his Motion for Remand by August 21, the existing deadline for  
6 Scott's response to the Complaint,

7 NOW THEREFORE, Plaintiff and Scott hereby stipulate that the deadline for Scott to  
8 respond to Plaintiff's Complaint shall be extended further, to and including September 18, 2006.

9 IT IS SO STIPULATED.

10 Dated: August 16, 2006

LAW OFFICE OF DENNIS L. KENNELLY

11  
12 By /s/ Dennis L. Kennelly  
13 Dennis L. Kennelly  
14 Attorneys for Plaintiff

15 Dated: August 16, 2006

THELEN REID & PRIEST LLP

16  
17 By /s/ Seth L. Neulight  
18 Seth L. Neulight  
19 Attorneys for Defendants  
DOLLAR TREE STORES, INC. and FRANK  
SCOTT

20 **[PROPOSED] ORDER**

21  
22 Pursuant to the parties' stipulation, the deadline for defendant Frank Scott's response to the  
23 Complaint shall be extended to and including September 18, 2006.

24 IT IS SO ORDERED.

25  
26 Dated: 08/17/06



27 HONORABLE THELTON E. HENDERSON  
28 United States District Judge